

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-***
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

AFFIDAVIT OF MICHAEL DELOY

I, Michael Deloy, having been duly sworn according to law, depose and state as follows:

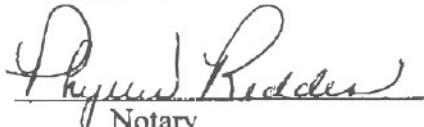
1. I make this Affidavit based upon personal information.
2. I am employed by the State of Delaware's Department of Correction as the Acting Warden at Sussex Correctional Institution ("SCI") in Georgetown, Delaware.
3. Plaintiff George Jackson, currently an inmate at SCI, has requested permission to inspect, measure, survey, photograph and test the ventilation units in the Main Kitchen at SCI.
4. Giving an inmate this type of access to any area of the prison presents security concerns.
5. In particular, if Plaintiff is permitted to photograph and diagram an area of the kitchen, he may obtain information useful in the potential hiding or transfer of contraband or in the planning of an escape. He will then be able to share this information with other inmates.
6. Certain types of contraband, such as drugs or weapons, present serious security risks for the institution.
7. For these reasons, pursuant to SCI practice, inmates are not permitted the type of

access to the facility requested by Plaintiff in this case.



Michael Deloy

SWORN AND SUBSCRIBED before me this 4th day of May, 2007.



Phyllis Redden
Notary

PHYLLIS REDDEN
Notary Public, State of Delaware
My Commission Expires October 31, 2007